

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED SOVEREIGN AMERICANS,
INC., BERNARD JOHNSON, AND
CITIZENS DEFENDING FREEDOM,

Plaintiffs,

v.

JANE NELSON, *in her official capacity as
Secretary of State of Texas*, KEN PAXTON, *in
his official capacity as Attorney General of Texas*,
and MERRICK GARLAND, *in his official
capacity as Attorney General of the United States*,

Defendants.

No. 2:24-CV-00184-Z

**DEFENDANTS' UNOPPOSED MOTION
TO EXTEND DEADLINE TO RESPOND TO PLAINTIFFS' COMPLAINT**

Secretary of State Nelson and Attorney General Paxton (“Defendants”), through counsel, hereby move the Court pursuant to Fed. R. Civ. P. 6(b)(1)(A) to extend the deadline to respond to Plaintiffs’ *Petition for Relief in the Form of a Writ of Mandamus* (hereinafter “Complaint”) by one week, from October 1, 2024 to October 8, 2024. Undersigned counsel has conferred with Plaintiffs’ counsel regarding the relief requested here, and Plaintiffs are unopposed.

1. Plaintiffs filed their Complaint on August 27, 2024 (Dkt. 1), served Defendants on September 10, 2024, and returned the summons to the Court on September 12, 2024. (Dkt. 7).

2. Currently, Defendants must respond to Plaintiffs’ Complaint on or before October 1, 2024. Fed. R. Civ. P. 12(a)(1)(A)(i).

3. Ample good cause supports extending the deadline for Defendants to respond to Plaintiffs’ Complaint. *See* Fed. R. Civ. P. 6(b)(1)(A). First, this extension is necessary to ensure that

Defendants and their counsel have sufficient time to investigate and properly brief the issues raised by Plaintiffs' lawsuit in a motion to dismiss. Second, counsel for Defendants has prior obligations in other matters that are demanding his time and attention, among them a reply brief due to a Texas Court of Appeals on or before September 30, 2024.

4. This request is not made for delay but only so that justice may be done.
5. Plaintiffs are unopposed to the relief requested in this motion.
6. This is Defendants' first request for an extension of this kind.

WHEREFORE, for the forgoing reasons, Defendants respectfully request that the Court extend the deadline for them to respond to Plaintiffs' Complaint through October 8, 2024.

Dated: September 25, 2024
Austin, Texas

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

/s/ Cole P. Wilson

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**COUNSEL FOR SECRETARY NELSON AND
GENERAL PAXTON**

Certificate of Conference

I certify that the parties have conferred regarding the relief requested, and that Plaintiffs are unopposed to an extension of one week for Defendants to respond to Plaintiffs' Complaint.

/s/ Cole P. Wilson

Certificate of Service

I certify that a copy of the document above was served on all counsel of record who have entered an appearance on September 25, 2024, using the Federal Court CM/ECF system.

/s/ Cole P. Wilson